

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PAVLE ZIVKOVIC, on behalf of himself and others
similarly situated,

No. 17-cv-00553-GHW

Plaintiff,

v.

LAURA CHRISTY LLC d/b/a VALBELLA,
LAURA CHRISTY MIDTOWN LLC, DAVID
GHATANFARD, and GENCO LUCA,

**QUESTIONS AND ANSWERS
IN CONNECTION WITH
INFORMATION SUBPOENA
AND QUESTIONNAIRE**

Defendants.

RE: Defendant David Ghatanfard (the "Judgment Debtor")

THE PEOPLE OF THE STATE OF NEW YORK

STATE OF NEW YORK)
) SS.:
COUNTY OF WESTCHESTER)

David Ghatanfard, being duly sworn deposes and says; that
deponent is the one of the defendants above stated and a recipient of an information subpoena
herein and of the original and a copy of questions accompanying said subpoena.

QUESTIONNAIRE

QUESTIONS TO BE ANSWERED BY THE JUDGMENT-DEBTOR, DAVID GHATANFARD IN RESPONSE TO THIS INFORMATION SUBPOENA.

Definitions

1. The terms "you," "yourself" or "your," shall refer to the Judgment-Debtors David Ghatanfard.
2. The phrase "period in question" shall refer to January 1, 2017 until the present.

Instructions

1. The responses to these questions shall be supplied by mailing and emailing a copy of such to Josef Nussbaum at the following address: Josef Nussbaum, Joseph & Kirschenbaum, LLP, 32 Broadway, Suite 601, New York, New York 10004 and jnussbaum@jk-llp.com.
2. In answering these questions, furnish all information that is available to you, including information known by or in the possession of yourself, your employees, experts, agents or affiliates, and not merely information within the personal knowledge of the individuals executing your answer to the questions.
3. Respond separately and completely to each question, or subdivision thereof, setting forth the question in full followed by each answer.
4. If, in answering the following, you are unable to answer fully, after exercising due diligence to obtain the information to do so, you shall answer said question to the fullest extent possible, specifying your inability to answer the remainder, describing the efforts taken by you to obtain the information to fully answer said question, and stating whatever information or knowledge you have concerning the unanswered portion thereof.
5. If, in answering the following questions, you state in whole or in part that "I do not know" or "unknown" or otherwise indicate any similar lack of knowledge, you shall state in detail

all efforts made to obtain the information requested, the nature of any continuing efforts in that regard, and by whom any such efforts were and are being made.

6. These questions are continuous in nature and require you to supplement or amend your answers if you subsequently obtain information relating to these questions or if subsequent events require supplementation or amendment of your answers. Such Supplementary Responses are to be filed and served upon Judgment-Creditors' counsel within seven (7) days after receipt of such information.

7. Whenever a question asks for the identification of any document, you shall, in addition to identifying the document, append a copy of the document to your answers to the questions. Each document furnished in response to any question shall be clearly labeled to indicate the question to which it is responsive and if it is intended to be responsive to more than one question, then said document shall be clearly labeled so as to indicate all questions to which it is responsive.

8. If in responding to these questions you require additional space, please respond on a separate document, indicate that you have done so in the response section, and append the separate document(s) to your responses.

9. Your responses must be verified and signed before a notary and must be sworn to under penalty of perjury.

QUESTIONS

1. State your full name, address(es) and telephone number(s) since January 1, 2017, and state the nature of your present occupation.

RESPONSE:

Davvid Ghatanfard; REDACTED-REDACTED-1191 ; 560 Oak Gropve Road, southhampton, NY;; 9 N. Canterbury Road, Harrison, NY 10528

Restaurant manager.

2. Identify each person or entity for whom you performed services since January 1, 2017 and state the amount you were paid for your services or the amount you are owed for your services.

RESPONSE: Laura Christy, LLC, Laura Christy Midtown LLC, Valbella at the Park LLC; amount paid: not su

3. Do you have any interest in a corporation, partnership, or trust? If so, state the name and address of each such corporation, partnership, or trust, and include the names, addresses and telephone numbers of all other shareholders, partners, settlers, trust protectors, trustees, and beneficiaries.

RESPONSE: No

4. Identify by name, address and telephone number each and every domestic and foreign bank and/or financial institution in which you have an account or over which you have signatory authority or other such control, and provide the account number, type of account, and account balance from January 1, 2017 to present. In addition, identify the record owner or title of the account.

RESPONSE: Bank of America

5. State whether you rent or have access to a safety deposit box titled in your name or in any other name. If so, state the name address of the bank or other financial institution at which the safety deposit box is maintained, the name and address of the person under whose name the box is rented, and list and describe in detail the contents of the box as of the date that these questions were served as set forth on the attached certificate of service.

RESPONSE: No

6. For all the assets and liabilities listed in the chart below, set forth in detail the dollar amount and fair market value dollar amount of these assets and/or liabilities with respect to yourself as of January 1, 2017 to the present:

RESPONSE:

Assets:	Amount (\$)	Fair Market Value (\$)
(1) Cash	Nominal	
(2) Cash surrender value of insurance	None	
(3) Accounts receivable	None	
(4) Notes receivable	None	
(5) Merchandise inventory	None	
(6) Real estate	Unknown	unknown
(7) Furniture and fixtures	Unknown	
(8) Machinery and equipment	None	
(9) Trucks and delivery equipment	None	
(10) Automobiles	Merceds Benz	Approx. \$4,000.00

(11)	Stocks, bonds, or other securities	None	
(12)	Pensions or annuities	None	
(13)	Gold	None	
(14)	Silver	None	
(15)	Jewelry	None	
(16)	Art	None	

Liabilities:	Amount (\$)	Fair Market Value (\$)
(1) Loans on insurance	None	
(2) Accounts payable	None	
(3) Notes Payable		
(4) Mortgages		
(5) Accrued real estate taxes		
(6) Judgments	Mortgage	Approx \$2,000,000.00

(7) Reserves	Name of Company	None	
--------------	-----------------	------	--

7. Provide the following information ~~regarding to insurance~~ policies now in force and owned directly or indirectly by you:

RESPONSE: NO

NONE			Present Cash Surrender Value Accumulated Dividends
Number of Policy			

Policy Loan	Date Made	Automatic Premium Payments Date Made
-------------	-----------	--------------------------------------

NONE		
------	--	--

8. If any of the policies listed in your answer to the preceding question are assigned or pledged on indebtedness, except with insurance companies, provide the following information about each policy:

RESPONSE: None

Policy Number Assigned or Pledged	Name & Address of Date Made	Amount of Indebtedness	Date Pledged or Assigned
NONE			

9. Do you have any accounts receivable or notes receivable? If so, set forth the name, address and telephone number of the person or entity that is indebted to you, and provide the amount of each account or note receivable.

RESPONSE:

NO

10. Do you currently own, claim an interest in, or possess any real property? If your answer to this Question is in the affirmative, state or identify:

- (a) The property's address;56 Oak Grove Road, Southampton, NY
- (b) The type of property (i.e., house, condominium, etc.);House
- (c) The cost of the property at the time purchased;Approx. \$1.9 million
- (d) Present fair market value of the property; Unknown
- (e) Any encumbrances against the property and the balance, if any, of the encumbrance (i.e., mortgage, etc.) Mortgage, approx.. \$2,000,000.00
- (f) How you titled the property upon its purchase or acquisition David Ghatanfard;
- (g) How the property is currently titled.David Ghatanfard and Rosie Kalayjian as joint tenants with right of survivorship

RESPONSE:

11. If you do not own the property where you currently reside, set forth the name, address and telephone number of the person(s) who owns the residence, the amount of your rent, and the frequency with which your rent must be paid.

RESPONSE:

12. Do you own, use or control any fixtures, furniture, machinery, equipment, trucks, automobiles, airplanes, or art? If your answer is in the affirmative, please set forth the following information:

RESPONSE: None

	Descriptions	Cost	Liquidation Value	Amount of Indebtedness Pledged	Date Pledged	Owner

(a) Furniture/ Fixtures (business)						
--	--	--	--	--	--	--

(b) Furniture (household)	Household furniture	unkown	unknown	none		
(c) Machinery/ Equipment (specify)	none					
(d) Trucks (specify make, model, VIN, year)	none					
(e) Automobiles (specify make, model, VIN, Year)	Meredesc Benz					
(f) Airplane (specify make, model, year)	none					
(g) Art (specify)	none					

13. Set forth the following information regarding all stocks, bonds, or securities (including, but not limited to, any interest in money market or other mutual funds) owned by you or held on your behalf from January 1, 2017, to present (and indicate if you sold or otherwise transferred any stock):

None

RESPONSE:

Name of Company	Record Owner	Number of Units	Cost	Fair Market Value	Amount of Indebtedness Pledged Owner
None					

- (a) If you receive any dividends or interest on any stocks, bonds, or securities, set forth the date the dividends or interest is payable, and the amount received in the last year.

RESPONSE: None

14. Identify all sources of income for the following years:

	2017	2018	2019	2020	2021	2022	
(a) Salaries, wages, commissions See attached tax returns;							Or

(b) Dividends;	none					
(c) Interest;	none					
(d) Income from business /profession	See attached tax returns					
(e) Partnership income;						
(f) Capital gains;	none					
(g) Annuities and pensions;	none					
(h) Rents and royalties;	none					
(i) Income from estates And trusts	none					
(j) Disposition of precious metals	none					

15. With respect to each of the items set forth in the preceding question, state the name, address, and telephone number of the source from which the income was received (and provide account numbers where applicable).

RESPONSE:

Laura Christi, LLC; Laura Christy Midtown, LLC; One If By land; Valbella at the Park, LLC

16. Have you directly or indirectly transferred, conveyed or disposed of any cash, assets or other items of value with a cost or fair market value of \$1,000.00 or more during the period of January 1, 2017 to present. If your answer to this question is in the affirmative, provide the following information for each such item:

RESPONSE: Yes

Description of Property or Asset	Date of Transfer	Fair Market Value When Transferred	Consideration Received	Name, Address of transferee and your relation
House				Rosey Kalayjian ; 1133 Warburton Avenue, Yonkers, NY

17. Do you have any life interest or remainder interest, either vested or contingent, in any trust or estate, or are you a beneficiary of any trust? If so, please furnish the following information and identify all supporting documentation:

RESPONSE:

No

--	--	--	--

Name of Trust or Estate	Present Value of Assets	Value of Your Interests	Amounts Received From this Source
None			

18. Do you have own or have an interest in any Individual Retirement Accounts, Stock Option Plans, pension or profit sharing plans, or any other savings or retirement plans other than those listed in response to previous questions. If your answer is yes, state the name, address and telephone number of the custodian of all such assets and state the amount.

RESPONSE:No

19. Have you any other assets or an interest in assets, either actual or contingent, other than those listed in the previous question requests (*i.e.*, paintings, sketches, drawings, sculptures, antiques, stamp collections, boat, musical instrument, etc.)? If so, please describe the assets in detail, identify the location of the asset, and state the current fair market value of each such asset.

RESPONSE:No

20. Have you prepared a financial statement within the last six years? If so, state:

(a) To whom the statement was given;

- (b) The reason the statement was prepared;
- (c) The date of the statement;
- (d) The name, address and telephone number of all persons who have a copy of such statement.

RESPONSE:

21. Identify every legal action in which you have been a party since January 1, 2017, including, but not limited to the title of the action, the name of the court, the docket number or date the action was filed, a brief description of the nature of the action, and the result of the legal action (e.g. judgment against a certain amount).

RESPONSE: Various, I do not recall titles but all are matter of public record.

22. Identify every loan made to you or that was outstanding from you since January 1, 2017, including, but not limited to name of the lender, date of the loan, maturity dates, principal amount, rate of interest, collateral or security interest given by you, your purpose in borrowing funds, and date and amount of each repayment.

RESPONSE: Mortgage/; Select Portfolio Servicing, P.O. Box 65250, Salt Lake City UT 84165-0250

23. Identify all credit, debit, and/or automatic teller (“ATM”) cards which you use or control, regardless of whether such cards are titled in your name, since January 1, 2017, and for each such card, identify, state or describe:

- (a) The name and address of the financial institution that issued the card (*i.e.*, VISA, MasterCard, American Express, bank, etc.);
- (b) The account number; and
- (c) The name(s) on the card.

RESPONSE:

Amex # REDACTED Amex # REDACTED Bank of America # REDACTED

24. State whether you established a trust for any purpose since January 1, 2017. If your answer is yes, state, describe or identify:

- (a) The location of the trust;
- (b) The name and address of the trustee, trust protector and the beneficiaries of the trust;
- (c) The assets of the trust and the location of such assets;
- (d) All documents that support your answer to this Question.

RESPONSE: No

25. State whether you currently have a will. If so, produce it.

RESPONSE: No

26. State whether you have filed with the Internal Revenue Service Federal Form 1040 income tax returns for the years 2017 to 2021. If your answer is affirmative, produce the return, and state:

- (a) The date that each return was filed;
- (b) The address or location of the IRS Service Center where the return was filed.

RESPONSE: See attached

27. State whether you have filed State income tax returns for 2017 to 2021. If your answer is affirmative, produce the return, and state:

- (a) The date that each return was filed;
- (b) The state with whom the return was filed;
- (c) The address where the state return was filed.

RESPONSE:

See attached

I hereby declare, under penalty of perjury, that I have verified the contents of these responses to be true.

(Print name) DAVIA GILFATIR FATA

State of New York)
County of Westchester) ss:

On the 20 day of Sept in the year 2022 before me, the undersigned, personally appeared DAVIA GILFATIR FATA personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name(s) is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument.


Notary Public

NEAL S. COMER
Notary Public, State of New York
No. 60-4771746
Qualified in Westchester County
Commission Expires Aug 31, 2026